

## **REMARKS**

### **Rejections under 35 U.S.C. § 103(a)**

Claims 1, 3, 4, 6, 10, 12, 13, 15, 19, and 21 stand rejected as being obvious over U.S. Patent No. 6,381,513 by Takase et al. in view of U.S. Patent Publication No. 2002/0178307 A1 by Pua et al. Applicants respectfully submit that the combination does not teach each and every element of the invention as claimed in claims 1, 3, 4, 6, 10, 12, 13, 15, 19, and 21.

Independent claims 1, 10 and 19, as amended, recite the limitation or a similar limitation as follows:

a plurality of memory card interfaces comprising a first subset to interface with a memory card of a first type and a second subset to interface with a memory card of a second type, wherein the memory card of the first type and the memory card of the second type are accessible in parallel to transfer data from the memory card of the first type to the memory card of the second type.

(Emphasis Added).

In contrast, Takase discloses an electronic information distributing terminal for writing electronic information (such as text information and corresponding motion image information) into a memory card. The terminal is equipped with a communication interface, a data buffer for temporarily storing the electronic information fed from the communication interface, a memory card interface, to which is removably attached a memory card equipped with an electrically rewritable nonvolatile semiconductor memory for allowing the memory card to separately store the electronic information from the data buffer. Thus, Takase's terminal does not teach or suggest transfer data from the memory card of the first type to the memory card of the second type.

Also, Pua discloses a multiple memory card adapter that comprises an interface for various types of memory cards, so that only one adapter is needed to allow different types of memory cards to be read from or written to by a host computer. Pua also does not teach or suggest transfer data from the memory card of the first type to the memory card of the second type.

Thus, Takase and Pua, individually or in combination, do not teach or suggest transfer data from the memory card of the first type to the memory card of the second type, as claimed in independent claims 1, 10 and 19. Therefore, the combination cannot render obvious Applicant's invention as claimed in claims 1, 1, 10 and 19 and dependent claims 3, 4, 6, 12, 13, 15, and 21, which depend from one of 1, 10 and 19. Applicants respectfully request the withdrawal of the rejection of the claims over the combination.

#### Claims 5 and 14

Claims 5 and 14 stand rejected as being unpatentable over Takase as modified by Pua in view of knowledge in the art that WORM memory cards may be used to create archives of media files. Applicants respectfully submit that the combination does not teach each and every element of the invention as claimed in claims 15 and 14.

As discussed earlier, Takase and Pua, individually or in combination, do not teach or suggest transfer data from the memory card of the first type to the memory card of the second type, as claimed in claims 1 and 10, upon which claims 5 and 15 respectively depend. Combining Takase and Pua with the alleged knowledge regarding WORM memory, does not disclose the claimed element.

Therefore, the combination cannot render obvious claims 5 and 14, and Applicants respectfully request the withdrawal of the rejection of the claims over the combination.

#### Claims 8 and 17

Claims 8 and 17 stand rejected as being unpatentable over Takase as modified by Pua in view of U.S. Patent No. 6,010,066 by Itou et al. Applicants respectfully submit that the combination does not teach each and every element of claims 8 and 17.

As discussed earlier, neither Takase nor Pua teaches transfer data from the memory card of the first type to the memory card of the second type as claimed in independent claims 1 and 10. Itou also does not teach or suggest transfer data from the memory card of the first type to the memory card of the second type as claimed in claims 8 and 17. Itou discloses a portable terminal device for electronic money IC cards containing monetary data. The device has a card slot opening to accept electronic money

IC cards, electric contact terminals for reading and writing the monetary data from and into the electronic money IC cards, a display for displaying money amount of the monetary data, and a button for manipulating the reading and writing operations of the monetary data. The portable terminal device does not transfer data from the memory card of the first type to the memory card of the second type as claimed.

Thus, combining Itou with Takase and Pua does not disclose the claimed limitation. Therefore, the combination cannot render obvious Applicant's invention as claimed in claims 8 and 17, which respectively depend from claims 1 and 10. Accordingly, Applicants respectfully request the withdrawal of the rejection of the claims under 35 U.S.C. § 103(a) over the combination.

#### Claims 2, 11, and 20

Claims 2, 11, and 20 stand rejected as being unpatentable over Takase as modified by Pua in view of U.S. Patent Publication No. 2003/0095386 A1 by Le et al. Applicants respectfully submit that the combination does not teach each and every element of the invention as claimed in claims 2, 11, and 20.

As discussed earlier, neither Takase nor Pua teaches transfer data from the memory card of the first type to the memory card of the second type as claimed in independent claims 1, 10 and 19. Le's apparatus also does not teach or suggest transfer data from the memory card of the first type to the memory card of the second types. Indeed, Le merely discloses an apparatus that receives a number of different types of flash memory cards using a single slot. The apparatus includes a housing that defines a slot to receive different types of removable memory cards. The slot includes a central region of a first height and outer regions of a second height. A plurality of electrically conductive contact areas are disposed within the slot.

As none of Takase, Pua, and Le teaches transfer data from the memory card of the first type to the memory card of the second types, the combination cannot render obvious dependent claims 2, 11, and 20, which depend from and include the limitations respectively of independent claims 1, 10 and 19. Applicants respectfully request the withdrawal of the rejection of the claims over the combination.

Claims 9 and 18

Claims 9 and 18 stand rejected as being unpatentable over Takase as modified by Pua and Itou further in view of Le. Applicants respectfully submit that as none of Takase, Pua, Itou, and Le teaches transfer data from the memory card of the first type to the memory card of the second types as claimed in claims 1 and 10, the combination cannot obvious claims 9 and 18, which depend respectively from claims 1 and 10. Accordingly, Applicants respectfully request the withdrawal of the rejection of the claims over the combination.

SUMMARY

Claims 1-6, 8-15, 17-21 are currently pending. In view of the foregoing amendments and remarks, Applicants respectfully submit that the pending claims are in condition for allowance.

If the Examiner determines the prompt allowance of these claims could be facilitated by a telephone conference, the Examiner is invited to contact John P. Ward at (408) 720-8300.

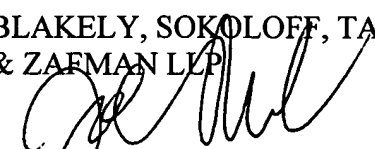
**Deposit Account Authorization**

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, then Applicants hereby request such extension.

Respectfully submitted,

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